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16 *Attorneys for Defendant Rocky Mountain Hospital
 17 and Medical Service, Inc. dba Anthem Blue Cross and
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19
 20 **UNITED STATES DISTRICT COURT**
 21
 22 **DISTRICT OF NEVADA**

23 STEVEN P. BRAZELTON, an Individual,
 24 NATHALIE HUYNH, an Individual, and JHB,
 25 an individual,

26 Plaintiffs,

27 vs.

28 ROCKY MOUNTAIN HOSPITAL AND
 29 MEDICAL SERVICE, INC., a Colorado
 30 Corporation doing business as HMO Nevada,
 31 Anthem Blue Cross and/or Blue Shield; HMO
 32 Colorado, INC., a Colorado Corporation doing
 33 business as HMO Nevada, Anthem Blue Cross
 34 and/or Blue Shield; BLACK CORPORATIONS
 35 1-10, and DOES I-X, Inclusive,

36 Defendants.

37 Case No: 2:24-cv-00994-GMN-BNW

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 39 **STIPULATED MOTION FOR**
 40 **EXTENSION OF TIME TO RESPOND**
 41 **TO PLAINTIFFS' MOTION TO**
 42 **COMPEL DISCOVERY**

43 (Second Request)

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 45 Defendants ROCKY MOUNTAIN HOSPITAL AND MEDICAL SERVICE, INC., and
 46 HMO COLORADO, INC. (collectively "Defendants"), by and through their attorneys of record,
 47 Peterson Baker, PLLC and Reed Smith LLP, and Plaintiffs STEVEN P. BRAZELTON, NATHALIE

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1 HUYNH, and JHB, by and through their attorneys of record, Bighorn Law (collectively “Plaintiffs”),
2 hereby stipulate and agree, subject to the Court’s approval, to extend the deadline for Defendants to
3 respond to Plaintiffs’ Motion to Compel Defendants’ Compliance with Fed. R. Civ. P. 26(f) (ECF
4 No. 38).

5 **Procedural Background**

6 1. On March 8, 2025, Plaintiffs filed their Motion to Compel Defendants’ Compliance
7 with Fed. R. Civ. P. 26(f) (“Motion”). ECF No. 38.

8 2. Currently, the deadline for Defendants to respond to the Motion is April 4, 2025, in
9 accordance with the Court’s March 25, 2025 Order. *See* ECF No. 42.

10 3. Following that Order, the Parties met and conferred concerning Plaintiffs’ Motion on
11 April 1, 2025 with the intent of potentially narrowing or resolving the issues subject to the Motion.

12 4. The Parties stipulate that the deadline for Defendants’ response be extended to April
13 23, 2025. Plaintiffs’ Reply in Support of their Motion shall be due seven days after the service of
14 Defendants’ response to the Motion. LR 7-2(b).

15 **Reasons Why an Extension Is Necessary**

16 5. The Parties believe that conferring further on the issues subject to Plaintiffs’ Motion
17 would be beneficial in order to determine if the issues can be resolved or narrowed without judicial
18 intervention.

19 6. In addition, the Parties are exploring options and taking steps to narrow the issues in
20 light of the Parties’ meet and confer on April 1, 2025.

21 7. Defendants also require additional time in order to prepare evidence in support of their
22 response to the Motion and would likely save additional resources in the preparation of such evidence
23 if the Parties were to agree on some of the issues that are the subject of the pending Motion.

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1 This stipulation is without prejudice to either Party, is made in good faith, with good cause,
 2 and not for the purpose of unduly delaying discovery or trial. This is the second request to extend the
 3 time to file a response to the Motion.

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IT IS SO STIPULATED.

5 **DATED:** April 3, 2025.

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BIGHORN LAW

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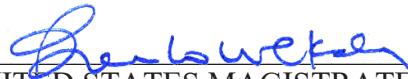
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Attorneys for Defendant Rocky Mountain
 Hospital and Medical Service, Inc. dba Anthem
 Blue Cross and Blue Shield

IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: April 4, 2025